

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

FILED
 UNITED STATES DISTRICT COURT
 LAS CRUCES, NEW MEXICO

for the

District of New Mexico

FEB 13 2025

United States of America

v.

Phillip Isaiah Lucero

Case No.

25-205 MJ

MITCHELL R. ELLERS
 CLERK OF COURT

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 22, 2024 in the county of Dona Ana in the
District of New Mexico, the defendant(s) violated:

Code Section

8 U.S.C. §1324(a)(1)(A)(v)(I)

Offense Description

Conspiracy to Violate 8 U.S.C.1324 - All subsections - did knowingly, intentionally, and unlawfully conspire, combine, confederate and agree with other persons known and unknown, to commit offenses against the United States, namely: to transport, move, and attempt to transport and move an alien within the United States by means of transportation and otherwise

This criminal complaint is based on these facts:

See Affidavit, attached and incorporated herein, by reference.

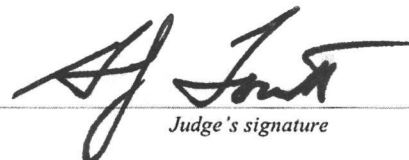
☒ Continued on the attached sheet.


Complainant's signature

Adrian Parra, U.S. Border Patrol Agent

Printed name and title

Subscribed and sworn to telephonically.

Date: 02/13/2025


Judge's signature

City and state: Las Cruces, New Mexico

Gregory J. Fouratt, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA

vs.

Phillip Isaiah Lucero

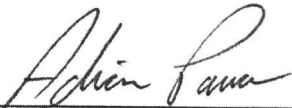
Continuation of Statement of Facts:

On or about October 22, 2024, in the State and District of New Mexico, the Defendant sent a Snapchat to a co-conspirator and offered the co-conspirator money to drive a group of undocumented aliens from El Paso, Texas to a stash house in Las Cruces, New Mexico. The co-conspirator agreed to transport the undocumented aliens to the stash house in Las Cruces, and drove the undocumented aliens to the stash house, per the Defendant's instructions. After the co-conspirator arrived at the stash house with the illegal aliens, the Defendant arrived at the stash house with food for the undocumented aliens.

After the co-conspirator's arrest, U.S. Border Patrol Agents were able to positively identify the Defendant through interviews and photographic identification, as the person who offered to pay the co-conspirator money to pick up the group of undocumented aliens and to bring them to the stash house in Las Cruces.

Because this Affidavit is being submitted for the limited purpose of establishing probable cause as set forth herein, I have not included each and every fact known to me concerning this investigation.

Assistant United States Attorney Mark Saltman was presented with the aforementioned facts and authorized criminal prosecution of the Defendant for violation of Title 8 United States Code, Sections 1324 (a)(1)(A)(v)(I).



Adrian Parra,
United States Border Patrol Agent



Gregory J. Houratt,
United States Magistrate Court Judge